

MORRIS LAW GROUP
Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101
Telephone: (702) 474-9400
Facsimile: (702) 474-9422
Email: sm@morrislawgroup.com
Email: rsr@morrislawgroup.com

HALLETT & PERRIN, P.C.
Michael S. Alfred (*pro hac vice*)
1445 Ross Ave, Suite 2400
Dallas Texas 75202
Email: malfred@hallettperrin.com

Attorneys for Plaintiff
SUSTAINABLE MODULAR MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the)	Case No. 2:20-cv-00790-JAD-NJK
use and benefit of SUSTAINABLE)	
MODULAR MANAGEMENT, INC., a)	
Texas corporation)	PLAINTIFF'S MOTION FOR
)	LEAVE TO FILE ANSWER TO JE
Plaintiff,)	DUNN'S COUNTERCLAIM
v.)	
)	
JE DUNN CONSTRUCTION COMPANY;)	(THIRD REQUEST)
FEDERAL INSURANCE COMPANY;)	
HARTFORD FIRE INSURANCE)	
COMPANY; TRAVELERS CASUALTY)	
AND SURETY COMPANY OF)	
AMERICA; DOE Individuals I-X and ROE)	
Entities I-X, inclusive,)	
Defendants.)	
)	
)	

UNITED STATES OF AMERICA, for the use and benefit of
SUSTAINABLE MODULAR MANAGEMENT, INC. ("Plaintiff" or "SMM") files

1 its Unopposed Motion for Leave to File Answer to JE Dunn Construction
2 Company's ("JE Dunn") Counterclaim (the "Counterclaim"), and in support
3 thereof, would respectfully state as follows:

4 1. Plaintiff's answer to the Counterclaim (Dkt. 25) was due by extension
5 on August 10, 2020.

6 2. As mentioned in Plaintiff's last extension request, the minor daughter
7 of Plaintiff's counsel was diagnosed with Covid-19 approximately two weeks ago.
8 The quarantine concluded yesterday with a full recovery by Plaintiff's counsel's
9 daughter and the transition back to the office for the undersigned counsel, but the
10 disruption involved with the quarantine was substantial. Due to that disruption,
11 and the workload of the SMM's counsel, including multiple hearings and
12 depositions by Zoom, Plaintiff requests an additional extension until August 12,
13 2020 to file its Answer to JE Dunn's Counterclaim.

14 3. JE Dunn has granted the extension and authorized the undersigned
15 counsel to represent that it is not opposed to this Motion for Leave to file SMM's
16 Answer and request for an additional extension of time until and including this
17 Wednesday, August 12, 2020.

18 4. Accordingly, Plaintiff respectfully requests an extension of time until
19 and including August 12, 2020 to file its Answer to JE Dunn's Counterclaim.

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SUSTAINABLE MODULAR
MANAGEMENT, INC.

IT IS SO ORDERED.

Dated this 12th of August, 2020.

UNITED STATES MAGISTRATE JUDGE